

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JUSTIN PULLIAM,

Plaintiff,

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS;
SHERIFF ERIC FAGAN, in his
individual capacity; OFFICER ROBERT
HARTFIELD, in his individual capacity;
OFFICER JONATHAN GARCIA, in his
individual capacity; OFFICER TAYLOR
ROLLINS, in his individual capacity; and
OFFICER RICKY RODRIGUEZ, in his
individual capacity,

Defendants.

**DECLARATION OF CHRISTEN MASON HEBERT
IN SUPPORT OF PLAINTIFF’S RESPONSE IN OPPOSITION
TO DEFENDANTS’ MOTION FOR CONTINUANCE**

I, Christen Mason Hebert, declare and state as follows:

1. I am a citizen of the United States and a resident of Texas. I am over eighteen years of age and competent to make this declaration. I knowingly and voluntarily submit this declaration in support of Plaintiff’s Response in Opposition to Defendants’ Motion for Continuance, and I would competently testify to the facts stated herein under oath.

2. I am an attorney with the Institute for Justice, which represents Plaintiff Justin Pulliam in this action.

3. Exhibit 1 to Plaintiff’s Response in Opposition to Defendants’ Motion for

Continuance is a true and correct copy of a 2024 email exchange between counsel for both parties and to the Court's Case Manager, Ms. Kimberly Picota, discussing resetting the status conference set for December 5, 2024.

4. Exhibit 2 to Plaintiff's Response in Opposition to Defendants' Motion for Continuance is a true and correct copy of a 2025 email exchange between counsel for both parties in which Defendants' counsel requested Plaintiff's position on seeking a two-week continuance of trial.

5. Exhibit 3 to Plaintiff's Response in Opposition to Defendants' Motion for Continuance is a true and correct copy of emails sent by counsel for both parties to the Court's Case Manager, Ms. Kimberly Picota, discussing Defendants' request that the April 14, 2025 trial be continued.

6. Exhibit 4 to Plaintiff's Response in Opposition to Defendants' Motion for Continuance is a true and correct copy of July 2023 emails exchanged by counsel for both parties about extending deadlines and rescheduling deposition dates.

I declare under penalty of perjury that the foregoing is true and correct and of my own knowledge.

DATED and SIGNED this 21st day of March 2025.


Christen Mason Hebert